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10 *Attorneys for Petitioner*  
11 *Tokyo Broadcasting System Television, Inc.*

12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **SAN FRANCISCO DIVISION**

15 IN RE: DMCA § 512(h) SUBPOENA  
16 TO TRABIA NETWORK

17 Case No.:

18 **TOKYO BROADCASTING**  
19 **SYSTEM TELEVISION, INC.'S**  
20 **REQUEST TO THE CLERK FOR**  
21 **THE ISSUANCE OF A SUBPOENA**  
22 **TO TRABIA NETWORK**  
23 **PURSUANT TO 17 U.S.C. § 512(h)**  
24 **TO IDENTIFY ALLEGED**  
25 **INFRINGER**

26 Tokyo Broadcasting System Television, Inc. ("TBS"), by and through its  
27 undersigned counsel of record, hereby requests that the Clerk of this Court issue a  
28 subpoena to Trabia Network to identify an alleged infringer or infringers, pursuant to  
the Digital Millennium Copyright Act ("DMCA"), 17 U.S.C. § 512(h) (the  
"Subpoena"). A copy of the proposed Subpoena is attached as Exhibit 2 to the  
Declaration of Nancy E. Wolff ("Wolff Decl.").

REQUEST FOR THE ISSUANCE OF SUBPOENA UNDER 17 U.S.C. § 512(H)

**FILED**  
APR 22 2021  
SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

FILED  
Paid  
NP

JCS

CV-21 80098-MISC

NC

1 The requested Subpoena relates to infringing materials that TBS discovered on  
2 the website <jshow.tv>, which TBS is informed and believes is hosted by Trabia  
3 Network. The infringing materials include unauthorized copies of full episodes of  
4 television programs, which are owned solely and exclusively by TBS.

5 TBS has satisfied the requirements for issuance of a subpoena pursuant to 17  
6 U.S.C. § 512(h), namely:

- 7 1. TBS has submitted a copy of the notification required by 17 U.S.C. §  
8 512(c)(3)(A). *See* Wolff Decl. ¶ 3, Ex. 1.
- 9 2. TBS has submitted the proposed Subpoena concurrently herewith. *See*  
10 Wolff Decl. ¶ 5, Ex. 2.
- 11 3. TBS has submitted a sworn declaration confirming the purpose for which  
12 the Subpoena is sought is to obtain the identity of the alleged infringer or  
13 infringers, and that such information will only be used for the purpose of  
14 protecting rights under Title 17 of the United States Code. *See* Wolff Decl.  
15 ¶ 4.

16 Because TBS has complied with the statutory requirements, TBS respectfully  
17 requests that the Clerk expeditiously issue and sign the proposed Subpoena pursuant to  
18 17 U.S.C. § 512(h)(4) and return it to the undersigned counsel for service on Trabia  
19 Network.

20  
21 DATED: April 22, 2021

COWAN, DEBAETS, ABRAHAMS  
& SHEPPARD LLP

22  
23 By: 

24 NANCY E. WOLFF

25 *Attorneys for Petitioner*  
26 *Tokyo Broadcasting*  
27 *System Television, Inc.*

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SUSAN Y. SOONG  
CLERK, US DISTRICT COURT  
NO. DIST. OF CA.